

JULIE BIBB DAVIS (CABN 184957)
Assistant United States Attorney

Attorneys for Defendant

FERNANDO DE LA CRUZ,

V.

LOUIS DEJOY, Postmaster General,

CASE NO. C-19-cv-01140 DMR

**STIPULATED REQUEST FOR
CONTINUANCE; ~~[PROPOSED]~~ ORDER
(AS MODIFIED)**

Pursuant to stipulation, the parties respectfully request a continuance of the following dates in this matter, including the CMC currently scheduled for September 15, 2021. Dkt. No. 80. Counsel for Defendant will be going on extended medical leave beginning on July 26, 2021, and will not return to work until the end of September 2021. Counsel for Defendant has met and conferred with Plaintiff's counsel, who has agreed to the continuance.

Accordingly, the parties respectfully request that the CMC be continued until a date after October 15, 2021 that is convenient for the Court. In addition, the parties request continuance of the discovery and expert disclosures dates as follows:

All non-expert discovery shall be completed by November 30, 2021

All expert disclosures and reports provided by November 30, 2021

Rebuttal experts shall be disclosed and reports provided by December 24, 2021

Expert discovery completed by January 14, 2022

Last day for hearing dispositive motions by January 27, 2022

Respectfully submitted,

STEPHANIE M. HINDS
Acting United States Attorney

DATED: July 23, 2021

/s/ Julie Bibb Davis

JULIE BIBB DAVIS
Assistant United States Attorney
Attorneys for Defendant

/s/ Glicel Sumagaysay

GLICEL SUMAGAYSAY
Attorney for Plaintiff

~~PROPOSED~~ ORDER (AS MODIFIED)

At the request of the parties and for good cause shown, the case management conference Oct. 20, 2021 at 1:30 pm by Zoom videoconference scheduled for September 15, 2021 is CONTINUED until _____. The parties shall submit a joint case management statement ~~no less than seven days prior to the CMC~~ by Oct. 13, 2021.

In addition, the discovery dates are revised as follows:

All non-expert discovery shall be completed by November 30, 2021

All expert disclosures and reports provided by November 30, 2021

Rebuttal experts shall be disclosed and reports provided by December 24, 2021

Expert discovery completed by January 14, 2022

Last day for hearing dispositive motions by January 27, 2022.

The 3/16/2022 pretrial conference and 3/28/2022 bench trial are VACATED and will be reset at the 10/20/2021 CMC.

IT IS SO ORDERED AS MODIFIED.

Dated: July 26/2021

